Case 5:10-cv-05533-EJD Document 91 Filed 01/12/12 Page IT IS SO ORDERED GEORGE D. YARON, ESQ. (State Bar #96246) JAMES I SILVERSTEIN, ESQ. (State Bar #143543) AS MODIFIED HIELAM CHAN, ESQ. (State Bar #267321) 2 gyaron@yaronlaw.com; jsilverstein@yaronlaw.com; hchan@yaron YARON & ASSOCIATES 3 Judge Edward J 601 California St, 21st Floor San Francisco, California 94108 Telephone: (415) 658-2929 Facsimile: (415) 658-2930 5 Attorneys for Plaintiff and Counter-Defendant PROBUILDERS SPECIALTY INSURANCE COMPANY, RRG 7 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 PROBUILDERS SPECIALTY INSURANCE) CASE NO.:5:10-cv-05533-EJD COMPANY, RRG, a District of Columbia, Risk) 12 STIPULATION AND (PROPOSED) Retention Group, ORDER TO EXTEND DEADLINES 13 Plaintiff. 14 VALLEY CORP. B., a California Corporation) formerly known as R.J. HAAS CORP.; RONALD) 16 J. HAAS, an individual; TY LEVINE, an) individual; and KAREN LEVINE, an individual,) 17 Defendants. 18 19 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and Counter-Defendant PROBUILDERS SPECIALTY INSURANCE COMPANY, RRG ("ProBuilders"); 21 Defendant and Counter-Claimants TY LEVINE, KAREN LEVINE (collectively "Levines"); and 22 Defendant, Counter-Claimant and Third-Party Plaintiff RONALD J. HAAS ("Mr. Haas"); and Third-23 Party Defendant Certain Underwriters of Lloyds of London ("Lloyds") to extend the current 24 deadlines as follows¹: 25 Last Day to Complete Alternative Dispute Resolution March 27, 2012 26 27 28 ¹/₂ See the concurrently filed "Declaration of James I. Silverstein in Support of Stipulation and [Proposed] Order to Extend Deadlines" for ProBuilders' counsel's explanation as to the need for this time extension.

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2	Expert Disclosure May 11, 2012
3	Rebuttal Expert Disclosure May 25, 2012
4	Close of Discovery June 20, 2012
5	Last Day for Hearing on Objection to Expert Disclosure June 29, 2012
6 7	Last Day for Hearing on Dispositive Motions August 24, 2012
8	Moreover, the parties, in light of the continuance of the various discovery-related dates,
9	stipulate to continue the Joint Pre-Trial Conference to August 10, 2012. However, if dispositive
10	motions are pending as of that date, the parties stipulate that the Joint Pre-Trial Conference will take
11	place on the first available Friday at 11:00 a.m., which is at least 45 days after the Court rules on any
12	pending dispositive motion. Moreover, the parties stipulate that the deadline for filing the Pre-Trial
1.3	Conference Statement will be 10 days before the Pre-Trial Conference.
14 15	IT IS SO STIPULATED.
16 17	DATED: January 6, 2012 YARON & ASSOCIATES
18 19	By: CHAN MONUM GEORGE D. YARON
20	JAMES I. SILVERSTEIN HIELAM CHAN
21	Attorneys for Plaintiff and Counter-Defendant PROBUILDERS SPECIALTY INSURANCE
22	COMPANY, RRG
23	DATED: January 6, 2012 SILICON VALLEY LAW GROUP
24	DATED: January -, 2012 SILICON VABBLET GAW GROOT
25	Ву:
26	KIM O. DINCEL CHRISTOPHER G. LAI
27 28	Attorneys for Defendants TY LEVINE AND KAREN LEVINE
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	Stipulation To Continue the Deadline to Complete ADR CA3299Pleadings\Stipulation.Extend.Deadlines.wpd
	22,5

1	Case 5:10-cv-05533-EJD Document 91 Filed 01/12/12 Page 3 of 4
1	DATED: January 6, 2012
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3	By: All
4	RONALD MAAS IN PRO SE
5	
6	DATED: January, 2012 WILLOUGHBY, STUART AND BENNING
7	
8	By:
9	RANDALL WILLOUGHBY Attorney for Third-Party Defendant CERTAIN UNDERWRITERS OF LLOYDS OF
10	CERTAIN UNDERWRITERS OF LLOYDS OF LONDON
11	
12	
13 14	PURSUANT TO STIPULATION, IT IS SO ORDERED
15	DATED:
16	UNITED STATES DISTRICT JUDGE
17	EDWARD J. DAVILA
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Case 5:10-cv-05533-EJD Document 91 Filed 01/12/12 Page 4 of 4 DATED: January ___, 2012 2 3 By: RONALD J. HAAS IN PRO SE 4 5 DATED: January 5, 2012 WILLOUGHBY, STUART AND BENNING 7 By: 8 9 Attorney for Third-Party Defendant CERTAIN UNDERWRITERS OF LLOYDS OF LONDON 10 **ORDER** 11 Pursuant to Stipulation, the Preliminary Pretrial Conference is rescheduled to August 10, 2012, at 11:00 a.m. A Joint Preliminary Pretrial Conference statement shall be filed on 12 or before July 31, 2012. This conference shall remain as scheduled regardless of whether dispositive motions remain pending at the time. 13 DATED: January 12, 2012 14 15 UNITED STATES DISTRICT JUDGE EDWARD J. DAVILA 16 17 18 19 20 21 22 23 24 25 26 27 28